



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

December 8, 2014

Bridget Psarianos, Project Lead
c/o GMT-1 Final SEIS Comments
222 West 7th Avenue, Stop #13
Anchorage, Alaska 99513

RE: EPA Comments on the Alpine Satellite Development Plan for the Proposed Greater Mooses Tooth Unit Development Project Final Supplemental Environmental Impact Statement, EPA Project # 04-005-BLM.

Dear Ms. Psarianos:

We have reviewed the above-mentioned Final Supplemental Environmental Impact Statement (SEIS) in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, as well as our role as NEPA cooperating agency.

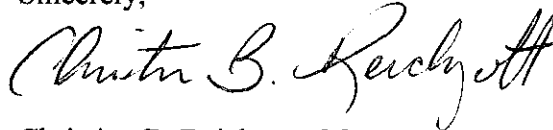
We previously rated Alternatives A, C, and D of the Draft SEIS "EC-2" (Environmental Concerns-Insufficient Information) based on concerns regarding impacts to air quality, Nuiqsut residents, Fish Creek, and waters of the U.S. We rated Alternative B "LO" (Lack of Objections) due to fewer impacts to water and the Fish Creek watershed, less impacts on residents and greater response capabilities. We also identified Alternative B as the potential environmentally preferable alternative. The Final SEIS identifies Alternative B as the preferred alternative. We support this decision and recommend that Alternative B be selected in the Record of Decision (ROD).

We also commend BLM for the inclusion of a modified Alternative D (Alternative D2-seasonal drilling) to ensure examination of a full range of alternatives. Although this alternative eliminates or minimizes many of the impacts associated with the road alternative, we also recognize that it may not be an economically viable alternative and also would result in the undesirable aircraft-associated impacts to caribou and residents. We appreciate the inclusion of Chapter 8 Public Comments and BLM Responses. This new chapter is very useful and provides clear responses to the commenters' remarks. Finally, we appreciate the additional and revised information on several resource sections, such as birds and fish.

We believe that the choice of Alternative B as the preferred alternative addresses many of the concerns raised in our comments on the Draft SEIS. However, we remain concerned about impacts to vegetation and wetlands. We offer the enclosed, specific comments for consideration in the ROD for this project, as well as for future projects in the National Petroleum Reserve-Alaska.

We appreciate the opportunity to review this Final SEIS and to serve as a cooperating agency on this SEIS process. If you have questions concerning our comments, please contact me at (206) 553-1601 or reichgott.christine@epa.gov, or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or curtis.jennifer@epa.gov.

Sincerely,

A handwritten signature in black ink, reading "Christine B. Reichgott". The signature is fluid and cursive, with the first name "Christine" and last name "Reichgott" clearly legible.

Christine B. Reichgott, Manager
Environmental Review and Sediments Management Unit

Enclosure:

1. EPA Region 10 Detailed Comments on the Alpine Satellite Development Plan
for the Proposed Greater Mooses Tooth Unit Development Project
Final Supplemental Environmental Impact Statement

**EPA Region 10 Detailed Comments on the Alpine Satellite Development Plan
for the Proposed Greater Mooses Tooth Unit Development Project
Final Supplemental Environmental Impact Statement**

Vegetation and Wetlands

In our April 22, 2014, letter on the Draft SEIS, we identified three main concerns with respect to vegetation and wetlands: 1) the inadequacy of the wetland functional assessment methodology; 2) the rankings of wetland types, especially for the saturated graminoid shrub type; and 3) the use of impact criteria that do not meaningfully differentiate between alternatives for vegetation and wetlands.

In its response to the first two of these concerns, the BLM stated that “the ASA (WFA) is being revised by ABR/CPAI in coordination with Corps, USFWS, and EPA. The ASA will be available for use as supporting documentation in 404 permitting for the GMT1 project.” Since the end of the comment period on the Draft SEIS in April 2014, the Wetland Functional Assessment has been replaced by Aquatic Site Assessments (ASAs), one each for Alternatives A and B, issued in September and October 2014 respectively. Neither ASA is included in the Final SEIS, in part due to resource agencies’ continuing concerns regarding those ASAs.

Although we have been actively involved in the development of the ASAs in the months since the Draft SEIS, and improvements have been made, we still have concerns about the ASA methodology as used on a North Slope project such as GMT-1. We expressed our concerns in our October 30, 2014, comment letter for the Public Notice review for ConocoPhillips’ application for a 404 permit for the GMT-1 project (POA-2013-461) and offered up some suggestions for improvement, including using an edge effect analysis for wildlife habitat and the assessment of the maintenance of a thermal regime for permafrost-driven systems.

In response to our comments that the impact criteria for vegetation and wetlands do not serve well to differentiate the levels of impacts among alternatives, the BLM’s response was that the impact criteria were appropriate for determining the magnitude of impacts and are similar to those used in the Point Thomson EIS.

The Draft SEIS for GMT-1 considered a two-pronged test for ranking intensity of impacts: one based on the extent of a single vegetation type being impacted when compared to the project study area; and the other based on the extent of the total area of Category I and II wetlands within the project study area that are impacted. In the Final SEIS, the latter of these two prongs was removed, i.e. the extent of Category I and II wetlands that are impacted in the project study area. The remaining prong – extent of a single vegetation type being impacted in the project study area – is skewed toward capturing only the rarest (least acreage) vegetation type, Cassiope dwarf shrub tundra, which is an upland vegetation type, not a wetland vegetation type. As we stated in our Draft SEIS comments, this is not a meaningful way to differentiate between alternatives for extents of impact.

The impact criteria in the Final SEIS for GMT-1 is also not similar to the impact criteria used for the Point Thomson Project EIS. From the Point Thomson Draft EIS, Section 5.8 (Vegetation and Wetlands) on p. 5-128, Table 5.8-1, the impact criteria for *vegetation* was based on the extent of impacts to a *single vegetation class* within the project study area. In addition, however, the impact criteria for *wetlands* were dependent on the extent of impacts to any specific wetland type *or the extent of impacts on all*

wetlands performing a given function within the project area (emphasis added). In this way, the functions that all the wetlands performed were weighed in assessing the extent of impacts for the Point Thomson Project EIS. In the case of the GMT-1 Final SEIS, the weighing of impacts to the wetland functional landscape is not taken into consideration.

Hydrology

We appreciate the modification to the language in Section 4.2.2.6, adding the phrase "...and the configuration of gravel placement", to reflect that the configuration of gravel placement plays a large role in potential impacts.